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Lincoln Benefit Life Company Inc.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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G INVESTORS HOLDING LLC as successors in	:
interest to STEPHEN CARB AS TRUSTEE OF	:
LOLLYTOGS, INC. TRUST,	:
	: 09-CV-2980 (RMB)(KNF)
Plaintiff,	:
vs.	:
	:
LINCOLN BENEFIT LIFE COMPANY INC.,	:
	:
Defendant.	:
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DECLARATION OF JILL CARY

JILL CARY, being duly sworn, hereby declares under penalty of perjury:

1. I am a Customer Research and Response Team Specialist at Lincoln Benefit Life Company Inc. ("Lincoln"), the defendant in this matter. I have been employed by Lincoln since 2006 and have held the title of Senior Unit Manager since 2007.
2. I make this Declaration in support of Lincoln's motion seeking an order pursuant to Fed. R. Civ. P. 56 granting Lincoln summary judgment and dismissing the amended complaint of plaintiff G Investors Holding LLC as successors in interest to Stephen Carb as Trustee of Lollytogs, Inc. Trust in its entirety. I make this Declaration upon my own personal knowledge and a review of the documents provided to me.

3. In my capacity as a Customer Research and Response Team Specialist, I respond to customer and agent inquiries.

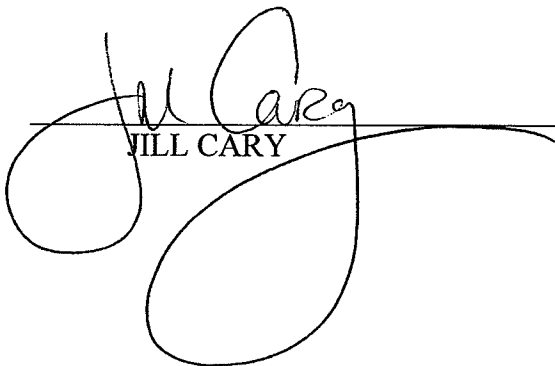
4. In or about late October or early November, 2007, I received a request for information from plaintiff Stephen Carb ("Carb") concerning two 20-year term insurance policies issued by Lincoln, bearing policy numbers T1133155 and T1125550 (collectively, the "Policies"), insuring the life of Samuel Gindi ("Gindi"). Copies of the Policies are attached as Exhibits K and L, respectively, to the accompanying Declaration of Stan Shelley ("Shelley Declaration").

5. After reviewing the policy files, including electronic notepads regarding the Policies, I advised Carb, by letter dated November 8, 2007, that: (i) the Policies were not convertible due to Gindi's age; (ii) Lincoln had previously offered a one time exception in 2003 to allow the insured to convert the Policies to new universal life policies; and (iii) the Policies were converted in 2003 but were later free looked -- i.e. rescinded -- and the original term Policies were reinstated. A copy of my November 8, 2007 letter to Carb is attached as Exhibit II to the Shelley Declaration.

6. I received no response to my November 8, 2007 letter.

I declare, pursuant to 28 U.S.C. § 1746, under penalty of perjury, that the foregoing is true and correct.

Executed on: Lincoln, Nebraska
August 24, 2011


JILL CARY